

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

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FIRST STUDENT, INC., A DIVISION )  
OF FIRST GROUP AMERICA, )

*Petitioner* )

v. )

**Nos. 18-1153  
18-1091**

NATIONAL LABOR RELATIONS BOARD, )

*Respondent* )

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UNITED STEEL, PAPER AND FORESTRY, )  
RUBBER, MANUFACTURING, ENERGY, )  
ALLIED INDUSTRIAL & SERVICE WORKERS )  
INTERNATIONAL UNION, AFL-CIO/CLC, )  
LOCAL 9036 )

*Intervenor*

**UNION’S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE ITS BRIEF**

To the Honorable, the Judges of the United States  
Court of Appeal for the D.C. Circuit:

The United Steel, Paper and Forestry, Rubber, Manufacturing, Energy,  
Allied Industrial & Service Workers International Union, AFL-CIO/CLC, Local  
9036 (“Union”) respectfully moves this Court for an extension of time, to and

including January 18, 2019, for the filing of the Union's brief in this case. In support, the Union shows:

1. The National Labor Relations Board's ("Board") brief is currently due in this case on December 5, 2018. On November 26, 2018, the Board moved this Court to grant it an extension through December 21, 2018, to file its brief. If this Court grants the Board's unopposed motion, under this Court's standard briefing schedule, which provides for the Intervenor's brief to be filed one-week following the Board's brief, the Union's brief would be due on December 28, 2018.

2. Amanda Fisher and Maneesh Sharma are primarily responsible for drafting the Union's brief. Amanda Fisher has a brief due before the Pennsylvania Labor Relations Board on December 21, 2018. The Union's headquarters are closed December 24, 2018, through January 1, 2019. Ms. Fisher will be on previously scheduled leave during that time. Mr. Sharma will be on previously scheduled leave, and largely will be out of the country, from December 14 through the New Year. Mr. Sharma has a brief due in *United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO-CLC v. NLRB*, No. 18-1222 in this Court on December 12, 2018. Furthermore, prior to his scheduled leave, Mr. Sharma anticipates additional filings in a pending injunctive action in the District Court of

the Southern District of West Virginia, and likely filing a new action for injunctive relief.

3. Oral argument has not yet been scheduled.

4. Counsel for the Union contacted counsel for First Student, Inc. and for the Board. Both indicated their respective clients do not oppose this motion.

WHEREFORE, the Union respectfully requests that the Court grants its unopposed motion for an extension of time up to and including January 18, 2019, for the filing of the Union's brief.

Respectfully submitted,

/s/ Amanda M. Fisher

Amanda M. Fisher

Assistant General Counsel

United Steelworkers

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412-562-2567

Dated this 27th day of November 2018

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Federal Rule of Appellate Procedure 32(g)(1), the Union certifies that its motion contains 365 words of proportionally spaced, 14 point type, and that the word processing system used was Microsoft Word 2016.

/s/ Amanda M. Fisher

Amanda M. Fisher

Assistant General Counsel

United Steelworkers

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**CERTIFICATE OF SERVICE**

I certify that on November 27, 2018 the foregoing motion was filed with the Clerk of the Court of the United States Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system, and that all counsel are registered CM/ECF users.

/s/ Amanda M. Fisher

Amanda M. Fisher

Assistant General Counsel

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